



217/782-6762

Refer to: 0316500002 -- Cook County
Chicago/Republic (LTV) Steel
ILD 056623598
Received July 22, 1985
Log #C-118

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EPA Region 5 Records Ctr.



307723

LTV Steel Company
Corporate Environmental Control Department
3100 East 45th Street
Cleveland, Ohio 44127

Gentlemen:

The closure plan for container storage (S01) and the additional information for closure of the K001 waste pile (S03) has been reviewed. Because of the following deficiencies, it has been disapproved.

1. The closure plan does not state a closure performance standard (725.211).
2. Washwater from listed waste decontamination is a hazardous waste and cannot be allowed to runoff, infiltrate into the soil or be dropped to sewers merely because it passes the EP Toxicity test (725.103(c)).
3. No provision was made for decontamination of the container storage floor slab (725.212(a)).
4. In the vicinity of the waste pile, soil must be removed to background levels of K001 constituents (hexavalent chromium, lead and cadmium). All sampling and analytical methods shall be in accordance with Appendix III of 40 CFR Part 261. "Background" values for soils should be established for site specific waste constituents that make up the wastes handled at the facility. A minimum of four (4) samples should be used to establish "background" in soils to account for natural occurrences and variability within each distinctive soil horizon. Background samples must be collected at an uncontaminated area on site. Based on waste type, mobility, operation practices and soil type, an estimate of contamination depth should be made and "background" samples taken at comparable depths. Multiple soil horizons should have "background" established separately (i.e., minimum of four (4) samples per each soil horizon). A grid system for sampling purposes should be established over the unit to be closed. For a unit size of 0.001 to 0.25 acre, use a 20 foot square grid interval; for a unit size of 0.25 to 3.00 acres, use a 40 foot square grid interval; and for unit size of over 3.00 acres, use a 60 foot square grid interval unless otherwise justified in the closure plan. Depth increments for soil



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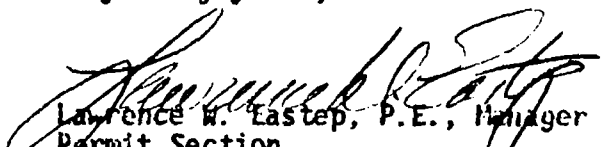
sampling within contaminated areas should be 3 to 6 inches for clayey soil and one (1) foot for silts and sands. These increments could be modified based upon knowledge of waste and site characteristics. Samples shall be tested for and reported as total concentrations.

5. If all contaminated soil is not removed, post-closure care and groundwater monitoring in accordance with 725.410 must be provided (725.358(b)).
6. Certification of closure in accordance with the approved closure plan must be provided by the owner or operator, in addition to the certification by an independent registered Professional Engineer (725.215).
7. No cost estimate was provided for soil sampling and analysis.
8. No cost estimate was provided for certification of closure.
9. The financial guarantee bond update was due June 30, 1985.

Pursuant to 725.212(d), you should submit a revised closure plan within 30 days which adequately responds to the above noted comments. Failure to submit a revised plan within 30 days will be considered non-compliance with the interim standards of 725 Subpart G -- Closure and Post-closure and Subpart H -- Financial Requirements.

Should you have questions or desire to schedule a meeting to discuss the closure plan, please contact Bob Carson of my staff at 217/782-9798.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:RAC:sd/2521e/32-33

cc: Northern Region
Division File ✓
Financial Assurance Unit
Bill Radlinski
USEPA, Region V -- Ann Budich